

PSJ3

Exhibit 208



Memorandum

Subject	Date
Distributor Initiative Briefing with AmerisourceBergen Drug (RA0290837)	JUL 26 2017
DFN: 601.04.02	

To
DEA Functional Filing System

From *for CDW*
Jorge L. Jimenez, Chief
Regulatory Unit/DRG
Diversion Control Division

On May 16, 2017, a meeting was held in Phoenix, Arizona at the Drug Enforcement Administration (DEA) Phoenix, Arizona District Office between the following participants of DEA and AmerisourceBergen Corporation.

- Representatives of AmerisourceBergen Drug Corp.: Elizabeth Garcia, Cooperative Investigator, Corporate Security & Regulatory Affairs, Marian Fisher, Regulatory Compliance Manager.
- Representatives from DEA HQ: Inez Davis, Staff Coordinator (SC) DRGR; Silvia Colon, SC, DRGR; Andrew Breiner (SC) DRGR; Latisha Mckoy, Program Analyst, DRGR and Ghana Giles, Program Analyst, DOPT.
- Representatives of DEA Phoenix, Arizona Division: Mike Grafton, Diversion Program Manager, Julie Antilla, Acting Unit Group Supervisor, Hoang Vo, and Diversion Investigators, Jamie Romero and Bethany McBride.

The purpose of the meeting was to address the distribution practices of controlled substances by AmerisourceBergen in an educational and informative format via a PowerPoint presentation. AmerisourceBergen is registered with DEA as a distributor in Schedules II-V (DEA number RA0290837).

AmerisourceBergen was presented with a binder containing a copy of the PowerPoint presentation. The following subjects were covered in the PowerPoint presentation:

- Prescription Drug Epidemic
- Closed System of Distribution
- Effective Controls to Prevent Diversion
- Know Your Customer
- Suspicious Orders
- Possible Administrative Actions
- AmerisourceBergen Drug Corp, ARCOS Data

Also included in the binder were copies of news articles regarding actions taken against CVS, Cardinal and Walgreens; news articles about criminal investigations of doctors and pharmacists; copies of Title 21 United States Code Sections 823 and 824; and copies of Title 21, Code of Federal Regulations Sections 1301.71 and 1301.76; and case law U.S. v Moore; and Direct Sales v. U.S.

SC Colon opened the meeting by explaining to the representatives of AmerisourceBergen that DEA reviewed ARCOS data reported by AmerisourceBergen for the firm's distributor registration from January 1, 2016, through March 31, 2017. SC Colon stated that the ARCOS data was for six different controlled substances, in which, AmerisourceBergen handles all six which were hydrocodone, oxycodone, methylphenidate, dl-amphetamine, d-amphetamine and fentanyl). SC Colon mentioned to AmerisourceBergen representatives that DEA reviewed the ARCOS data that indicated sales to practitioners, pharmacies, hospitals, reverse distributors, distributors and manufacturers.

SC Colon provided information on the increasing abuse of prescription drugs and the increase of heroin overdose deaths. which is due in part to the abuse of pharmaceutical opiates.

SC Colon described the closed system of distribution and explained both DEA's and AmerisourceBergen's roles in maintaining the integrity of the system. SC Colon advised the representatives of AmerisourceBergen of their obligation to provide effective controls against diversion, and that hydrocodone is the most abused drug in the United States (US). SC Colon stressed to AmerisourceBergen representatives to "Know Your Customers" and SC Colon provided examples of "Red Flags" that might indicate diversion is occurring. SC Colon spoke about suspicious orders and the requirements for reporting suspicious orders.

As part of the PowerPoint presentation, SC Colon showed charts and graphs which had been derived from AmerisourceBergen's own ARCOS data. The data showed that AmerisourceBergen's largest customers are distributors with large quantities of hydrocodone beings sold. AmerisourceBergen sells to distributors in California, Montana, Texas, Virginia, Ohio, Florida, New Mexico, Ohio and Illinois.

SC Colon brought to the attention of the AmerisourceBergen representatives to report Thefts and Losses within one business day. AmerisourceBergen did not have any reported ARCOS errors.

At this time, the floor was opened for questions. AmerisourceBergen did not have any reported ARCOS errors.

AmerisourceBergen was very appreciative of the briefing. The meeting with DEA and AmerisourceBergen was concluded.

DRG _____ JJimenez

DRG/A _____ CWashington

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